

Jack R. Nelson (SBN 111863)
 Email: jnelson@reedsmith.com
 Keith D. Yandell (SBN 233146)
 Email: kyandell@reedsmith.com
 REED SMITH LLP
 1999 Harrison Street, Suite 2400
 Oakland, CA 94612
 Telephone: +1 510 763 2000

Attorneys for Defendants World Savings Bank,
 FSB and Ken Thompson

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

CESAR ANCHANTE-MARTINETTI
 Sramineus Homo, US Vessel,

Libellant,

v.

WORLD SAVINGS, KEN THOMPSON,
 President, U.S. Vessel DOES, ROES, and MOES
 1-100 et al, US Vessel sand,

Libellees,

No.: CV 07-5929

**REPLY IN SUPPORT OF DEFENDANTS'
 MOTION TO DISMISS PLAINTIFF'S
 FIRST AMENDED COMPLAINT**

Date: March 28, 2008
 Time: 9:00 a.m.
 Place: Courtroom 10, 19th Fl.
 Compl. Filed: November 26, 2007

Honorable Susan Illston

Cesar Anchante-Martinetti
 Lien Holder of the Vessel, the Real Party
 In Interest, Lawful Man
 Injured Third Party Intervener/Petitioner/
 Libellant,

v.

WORLD SAVINGS, KEN THOMPSON,
PRESIDENT, U.S. Vessel
DOES, ROES and MOES 1-100 et al
US VESSELS
INDIVIDUALLY AND SEVERALLY,

Third Party Defendants/Libellees

REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

I. INTRODUCTION

Nothing in Plaintiff Cesar Anchante-Martinetti's ("Plaintiff") "Answer to Motion to Dismiss" addresses the deficiencies in his First Amended Complaint ("FAC"). These deficiencies are as follows:

- Plaintiff did not file his amended Complaint within the time proscribed by the Court's January 23, 2008 Order.
- Plaintiff has not (and cannot) stated a single cause of action against World Savings Bank, FSB, let alone its President Ken Thompson.
- Plaintiff's FAC is hopelessly vague.
- Plaintiff has not stated the grounds for this Court's jurisdiction.

Plaintiff's *pro per* status does not excuse his failure to present any facts that could be interpreted to support a cause of action. As this is Plaintiff's second attempt to state a cause of action against World Defendants, his FAC should be dismissed *with prejudice*.

DATED: March 14, 2007.

REED SMITH LLP

By /s/ Keith D. Yandell
 Jack R. Nelson
 Keith D. Yandell
 Attorneys for Defendants World Savings Bank,
 FSB and Ken Thompson